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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Juan Villalon,

Plaintiff,

vs.

Kilolo Kijakazi, Acting
Commissioner of Social Security,

Defendant.

Case No. 1:20-cv-01830-SKO

STIPULATION AND ORDER FOR
EXTENSION OF TIME

(Doc. 23)

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 30-day extension of time, from October 5, 2021 to November 4, 2021, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Good cause exists for this request.

Counsel has recently received a greater number of Answers and Certified Administrative Records from defendant in cases in this district, and the three other California Districts, each of which require settlement negotiations or merit briefing. Counsel has a greater than usual number of merit briefs due in September and October 2021. For the remainder of September 2021, Counsel for Plaintiff has about 4 briefs due ranging from confidential settlement proposals, opening briefs and replies. Counsel also has many merit briefs due in October 2021. Counsel also has an administrative hearing calendar in excess of 4 cases for the remainder of September and 27 hearings in October 2021.

Thus, Counsel is requesting an extension until November 4, 2021 to accommodate the number of cases due in September and October 2021. Also, Counsel is in the process of increasing support staff to accommodate the increase in the number of cases at the briefing stage.

Defendant does not oppose the requested extension. Counsel apologizes to the Defendant and Court for any inconvenience this may cause.

Respectfully submitted,

Dated: September 28, 2021 PENA & BROMBERG, ATTORNEYS AT LAW

By: /s/ Jonathan Omar Pena
JONATHAN OMAR PENA
Attorneys for Plaintiff

Dated: September 28, 2021 PHILLIP A. TALBERT
Acting United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

1 By: */s/ Geralyn Gulseth
2 Geralyn Gulseth
3 Special Assistant United States Attorney
4 Attorneys for Defendant
5 (*As authorized by email on September 28, 2021)
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ORDER

Pursuant to the parties' foregoing second stipulation (Doc. 23), IT IS
HEREBY ORDERED that Plaintiff shall have until November 4, 2021, to file his
Motion for Summary Judgment. All other dates in the Scheduling Order (Doc. 18)
shall be extended accordingly.

IT IS SO ORDERED.

Dated: **September 30, 2021**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE